

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA

UNITED STATES OF AMERICA, Plaintiff, vs. PATRICK ROSS, Defendant.	5:24-cr-50185-CCT DEFENDANT'S UNOPPOSED FIRST MOTION TO CONTINUE TRIAL DATE AND RELATED PRETRIAL DEADLINES
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Comes now Patrick Ross, Defendant above-named, by and through his attorney, Assistant Federal Public Defender Paul R. Winter, and moves this Honorable Court for its Order continuing the dates scheduled in the Court's Order dated January 13, 2025, on the following grounds:

Counsel needs additional time to review discovery, retain any expert necessary, and to either engage in plea negotiations or prepare for trial. Therefore, Defendant respectfully requests a sixty (60) day continuance in this matter.

The undersigned further represents to the Court that this motion is made neither for purposes of undue delay nor other improper reason. Counsel makes this request for the Defendant for the reasons set forth above, taking into account the exercise of due diligence.

Defense counsel has advised the Defendant of this motion, its purpose, and his constitutional and statutory right to a speedy trial pursuant to 18 U.S.C. § 3161, *et seq.* Defendant's consent to the continuance will be filed as soon as it has been returned from Defendant.

AUSA Benjamin Patterson has no objection to this motion. Counsel for the codefendant in this matter has no objection to this motion.

Dated this 24th day of February 2025.

Respectfully submitted,

JASON J. TUPMAN
Federal Public Defender
By:

/s/ Paul R. Winter

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